



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

November 5, 2018

Via ECF

The Honorable Paul G. Gardephe  
United States District Judge  
Southern District of New York  
New York, New York 10007

**Re:    United States v. Fredy Renan Najera Montoya,  
S1 15 Cr. 378 (PGG)**

Dear Judge Gardephe:

The Government writes on behalf of the parties to request a modification to the schedule for the filing of motions *in limine*, requests to charge, and proposed voir dire, which are currently due on Friday, November 9, 2018. (*See* Dkt. No. 14). Specifically, the parties request that the November 9 deadline be adjourned until November 16, and that the deadline for responsive submissions be adjourned until November 26. The reasons for this request are to allow defense counsel time to prepare a reply submission in further support of pending pretrial motions, which is also due on November 9 (*see* Dkt. No. 44), and to afford the parties additional time to refine their positions regarding motions *in limine* and jury instructions based on the content of the defendant's reply and additional ongoing trial preparations.

Respectfully submitted,

GEOFFREY S. BERMAN  
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(Via ECF)